

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

TOM DEROSIER and MICHEL BRYANT,  
Plaintiffs,

v.

GEOFFREY NOBLE, in his official capacity as  
Superintendent of the Massachusetts State Police;  
SGT. MICHAEL HARDMAN, in is official and  
personal capacities; and JOHN DOES 1 & 2 in  
their official capacities as Massachusetts State  
Police officers and in their personal capacities,  
Defendants.

Civil Action No. \_\_\_\_\_

**CERTIFICATION OF BASIS FOR RELATED CASE**

TOM DEROSIER and MICHEL BRYANT (collectively, the Plaintiffs), by and through undersigned counsel, hereby submit this certification, pursuant to Local Rule 40.1(g), designating the above-captioned matter as a related civil case to *Jason Grant et al. v. Trial Court of the Commonwealth of Massachusetts et al.*, Case No. 1:25-cv-10770, in the United States District Court for the District of Massachusetts (hereinafter the “Related Case”). As a basis for the designation, Plaintiffs state as follows:

1. One of the parties in this matter are the same as in the Related Case: Geoffrey Noble, as Superintendent of the Massachusetts State Police.
2. This case involves almost all the same issues of fact and law, notably the “buffer zone” established around the Norfolk Superior Courthouse to prohibit demonstrations regarding *Commonwealth v. Read*, Case No. 2282CR00017, in the Trial Court of the Commonwealth of Massachusetts, Superior Court Department, Norfolk County (hereinafter the “Read Case”).

3. This case involves the same or substantially similar occurrence, as Plaintiffs were newsgathering on the demonstrations giving rise to the Related Case.

WHEREFORE, pursuant to Local Rule 40.1(g), the above-captioned matter should be designated as a related civil case to *Jason Grant et al. v. Trial Court of the Commonwealth of Massachusetts et al.*, Case No. 1:25-cv-10770, in the United States District Court for the District of Massachusetts.

Dated: April 3, 2025.

Respectfully Submitted,

/s/ Marc J. Randazza

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